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June 21, 2009

Mr. Michael Jeffers
Mr. Warren Walton
Hazardous Waste and Toxics Reduction Program
Washington Department of Ecology (ECOLOGY)
Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008-5452

RE: Tanks System Closure and Post-Closure Care 3600 E Marginal Way Response

Gentlemen,

Clean Harbors Environmental Services (Clean Harbors) provides hazardous and dangerous waste services for Alaskan Copper Works (ACW) located at 3223 Sixth Avenue South in Seattle, Washington 98124-3546.

ACW has requested Clean Harbors to serve on its behalf in the matter of tank closure located at 3600 E Marginal Way in Seattle, WA and specifically to assist in submitting this response to your written notice for tank closure dated May 21, 2009.

Subject to final pre-closure discussions and agreement between ACW and ECOLOGY, within 15 days of receipt of this response Clean Harbors, on behalf of ACW, will provide a draft tank system closure plan to include the following elements;

1. Methodology for the decontamination and subsequent removal of waste residues present on interior and exterior tank system surfaces.
2. Methodology and rationale for the verification of decontamination of tank surfaces.
3. Method for the management of dangerous wastes to include staging, storage, classification, transportation and disposal.
4. Methodology for the decontamination and/or subsequent removal of tank containment surfaces and underlying subsurfaces.
5. Methodology and rationale for the verification of tank containment surfaces and underlying subsurfaces.
6. Cost estimates for closure and post-closure care along with a financial responsibility statement from ACW based on cleanup cost estimates provided by Clean Harbors.

The closure plan will provide tank system background and operational past history along with an assessment of known or suspected hazardous or dangerous chemical compositions.

The closure plan scope will extend to subsoil investigation to determine the presence of hazardous or dangerous substance associated with the tank system in subsurface soils or groundwater and how discovered substances would be remediated.

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A written sampling plan and health and safety plan will be presented with the draft closure plan along with a schedule of activities and completion of work date.

The plan will provide references to applicable state and/or federal regulations governing tank system closure and post closure along with contingency closure and post-closure plan.

Once ECOLOGY accepts a final closure plan, ACW would be prepared to authorize closure within 30 days and to complete closure within 60 days of commencement of site work.

In conjunction with closure plan development, ACW and Clean Harbors will identify and establish a temporary EPA ID number for the location of the tank system.

A written closure report containing closure activity logs, waste management and disposition tracking and all verifications would be submitted to ECOLOGY within 30 days from date of scheduled completion.

Clean Harbors will be pleased to provide clarification or additional detail should you have additional questions or concerns. Please feel free to contact me directly at 503-997-0339 or by e-mail to my e-mail address at dunn.matthew@cleanharbors.com

All correspondence will be distributed to Mr. Jim Brown of Alaskan Copper Works and members of the Clean Harbors staff who will be providing assistance in this matter.

Alaskan Copper Works and Clean Harbors look forward to working Ecology and anticipate a safe, complaint and expedient conclusion in this matter.

On behalf of Alaskan Copper Works,

Matthew Dunn
Technical Services Manager, Northwest Region
Clean Harbors Environmental Services

Cc:

Mr. Jim Brown, Operations Manager, Alaskan Copper Works
Mr. Dave Casteneda, General Manager, Clean Harbors
Mr. Shawn Estrada, Service Specialist, Clean Harbors